IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

THE ESTATE OF DAMON R FISHER et * al.,

Plaintiffs,

CIVIL NO. 1:21-cv-01074-CCB

v.

*

*

THE CITY OF ANNAPOLIS et al., Defendants.

.

REPLY IN RESPONSE TO PLAINTIFFS' MOTION FOR PARTIAL SUMMARY JUDGMENT

Defendant Housing Authority of the City of Annapolis ("HACA") by its undersigned attorney, replies in response to Plaintiff's Motion for Summary Judgment and states as follows:

Plaintiff's motion as drafted seeks a determination on as to Count I, (Fair Housing Act, 42 U.S.C. § 3601 *et seq.*) the disparate impact claim, only as to Defendant the City of Annapolis (the "City"). Because the motion does not seek a finding of fact or law against HACA, HACA does not believe a response is necessary at this time. Out of caution HACA files this reply to reserve its opportunity to defend against the claim if and when it is raised against HACA.

WHEREFORE, Defendant Housing Authority of the City of Annapolis reserves the right to address the disparate impact claim and requests that no finding against the City be interpreted against HACA in this case.

Respectfully submitted,

Carrie Blackburn Riley

Federal Bar No.22778

Blackburn Riley, LLC

Bosley Hall 222 Courthouse Court, Suite 2F Baltimore, Maryland 21204 410-825-8088 410-321-4944 (Fax) 410-215-8279 (Cell) cbr@BlackburnRiley.com

Attorney for Defendant/ Cross-Defendant/Cross-Plaintiff Housing Authority of the City of Annapolis

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 14th day of April, 2023, a copy of the foregoing was emailed to all counsel of record. In accordance with the Court's Rules and local rules this document which relates to discovery was not electronically filed with the court.

Carrie Blackburn Riley Federal Bar No.22778